

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Trustee-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

MADOFF SECURITIES

Adv. Pro. No. 08-01789 (BRL)

SIPA Liquidation

(Substantively Consolidated)

12-mc-00115

NOTICE OF APPEARANCE

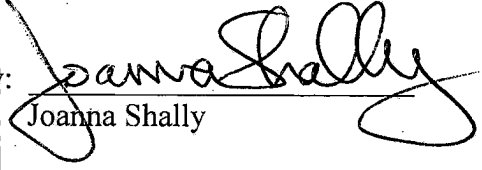
PLEASE TAKE NOTICE that Joanna Shally, an attorney admitted to practice in this Court hereby appears as counsel on behalf of Defendant Banco Bilbao Vizcaya Argentaria, Defendant Inteligo Bank Ltd. Panama Branch f/k/a/ Blubank Ltd. Panama Branch, Defendant Naidot & Co., and Defendants Banco Itaú Europa Luxembourg, S.A. and Banco Itaú Europa International in the above-captioned consolidated action,¹ and respectfully requests that all pleadings, notices, orders, correspondence and other papers filed in connection with the action be served on the undersigned. Defendants reserve all defenses or objections to the jurisdiction or venue of this Court, and this appearance in no way waives any such rights.

¹ Counsel appears on behalf of these, and only these defendants, and represents these defendants in four separate proceedings before this Court: (1) Defendant Banco Bilbao Vizcaya Argentaria, in *Picard v. Banco Bilbao Vizcaya Argentaria*, Case No. 11-cv-7100; (2) Defendant Inteligo Bank Ltd. Panama Branch f/k/a Blubank Ltd. Panama Branch, in *Picard v. Inteligo Bank Ltd. Panama Branch f/k/a Blubank Ltd. Panama Branch*, Case No. 12-cv-2364; (3) Defendant Naidot & Co., in *Picard v. Naidot & Co.*, Case No. 12-cv-2365; and (4) Defendants Banco Itaú Europa Luxembourg, S.A. and Banco Itaú Europa International, in *Picard v. Banco Itaú Europa Luxembourg, S.A. and Banco Itaú Europa International*, Case No. 12-cv-2432.

Dated: April 20, 2012
New York, New York

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Luxembourg, S.A. and Banco Itaú Europa
International*